

GOTLIB LAW

REQUEST GRANTED.

October 6, 2023

Via ECF


The Honorable Lewis J. Liman
United States District Court Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Defendant's motions are due by January 8, 2024. Government opposition due by January 16, 2024. Replies, if any, are due by January 19, 2024. The Motion Hearing is rescheduled to January 24, 2024 at 2:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. A Final Pretrial Conference will be held on April 3, 2024 at 2:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. A Jury Trial will be held on April 8, 2024 at 9:00AM in Courtroom 15C at the 500 Pearl Street Courthouse. The Court excludes time from October 10, 2023 until January 24, 2024 pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interest of justice outweighs the interest of the public and the defendant in a speedy trial, in that the time between now and January 24 will allow defendant to continue to review discovery, defendant to consider and prepare potential pretrial motions, and parties to discuss a potential pretrial disposition.

Re: *United States v. Raquel Moura Borges*, 21 Cr. 172 (LJL)

Dear Judge Liman:

10/10/2023

SO ORDERED.

LEWIS J. LIMAN
United States District Judge

I represent the defendant in the above-captioned matter. I write, with the consent of the government, to respectfully request an adjournment to the second week of January 2024 of the defendant's pretrial motion deadline currently due on October 25, 2023, and that the subsequent opposition deadline and hearing date, respectively scheduled for November 1 and November 15, 2023, be adjourned accordingly. If the Court grants this application, I further request, with the consent of the government, an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, through the new date scheduled by the Court for the motion hearing. This is the second request for an adjournment of the motion deadlines and hearing since the undersigned was appointed as substitute counsel to represent Ms. Borges on May 26, 2023.

While the government promptly produced discovery to the undersigned, it is voluminous, and more time is necessary for a thorough review. The requested adjournment is necessary to permit the undersigned and Ms. Borges to continue reviewing the voluminous discovery, consider and prepare potential pretrial motions, and for the parties to discuss a potential pretrial disposition. It is for these same reasons that we believe exclusion of time under the Speedy Trial Act would be appropriate pursuant to 18 U.S.C. § 3161(h)(7)(A).

Accordingly, it is respectfully requested that the October 25, 2023, pretrial motion deadline be adjourned until the second week of January 2024 and that the opposition deadline and motion hearing date be adjourned accordingly. It is further requested that time be excluded under the Speedy Trial Act through the new hearing date scheduled by the Court. I thank the Court for its consideration.

Respectfully Submitted,

/s/

Valerie A. Gotlib

Cc: All counsel of record (*via ECF*)